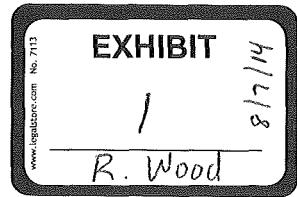


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION



MARC VEASEY, *et al.*, §  
Plaintiffs, §  
VS. § CIVIL ACTION NO. 2:13-CV-00193  
RICK PERRY, *et al.*, §  
Defendants. §

**DEFENDANTS' AMENDED NOTICE OF DEPOSITION DUCES  
TECUM TO RANDALL BUCK WOOD**

To: Counsel.

Pursuant to the Federal Rules of Civil Procedure, the State of Texas, Rick Perry, the Texas Secretary of State<sup>1</sup> and Steve McCraw ("Defendants"), by and through the Attorney General for the State of Texas, give notice that they will take the deposition by oral examination of Randall Buck Wood, on August 7, 2014, at 10:30 a.m.

This deposition will be recorded by stenographic means, conducted before an individual authorized to administer oaths, and used for any purpose permitted under the Federal Rules of Civil Procedure or court order. The deposition may be videotaped. The deposition will continue from time to time and place to place until concluded.

Please produce at the deposition, any and all documents and tangible things that you relied on to prepare for your testimony at the deposition. The term "you"

<sup>1</sup> Various complaints identify the Texas Secretary of State as John Steen. The current Secretary of State, however, is Nandita Berry.



means Randall Buck Wood and his agents, representatives, attorneys, experts, and other persons acting or purporting to act on Randall Buck Wood's behalf. The term "document" means information that is fixed in a tangible medium, such as paper, or electronically stored information. It includes, but is not limited to, writings, drawings, films, charts, photographs, notices, memoranda, diaries, minutes, correspondence, books, journals, ledgers, reports, worksheets, notes, printed e-mails, letters, abstracts, audits, charts, checks, diagrams, drafts, instructions, lists, logs, resumes, and summaries. The term "electronically stored information" means electronic information that is stored in a medium from which it can be retrieved and examined. It includes, but is not limited to, all electronic files that can be retrieved from electronic storage. "Electronic file" includes, but is not limited to, the following: electronic documents; e-mail messages and files; deleted files; temporary files; and metadata. "Electronic information system" refers to a computer system or network that contains electronic files and electronic storage. "Electronic storage" refers to electronic files contained on magnetic, optical, or other storage media, such as hard drives, flash drives, DVDs, CDs, tapes, cartridges, floppy diskettes, smart cards, integrated-circuit cards (e.g., SIM cards). The term "tangible thing" means a physical object that is not a document.

Dated: August 6, 2014

Respectfully submitted,

GREG ABBOTT  
Attorney General of Texas

DANIEL T. HODGE  
First Assistant Attorney General

JONATHAN F. MITCHELL  
Solicitor General

J. REED CLAY, JR.  
Special Assistant and Senior Counsel  
to the Attorney General  
Southern District of Texas No. 1160600

/s/ John B. Scott  
JOHN B. SCOTT  
Deputy Attorney General for Civil Litigation  
Southern District of Texas No. 10418  
Texas State Bar No. 17901500  
ATTORNEY-IN-CHARGE

G. DAVID WHITLEY  
Assistant Deputy Attorney General  
Southern District of Texas No. 2080496

STEPHEN RONALD KEISTER  
Assistant Attorney General  
Southern District of Texas No. 18580

JENNIFER MARIE ROSCETTI  
Assistant Attorney General  
Southern District of Texas No. 224780

LINDSEY ELIZABETH WOLF  
Assistant Attorney General  
Southern District of Texas No. 2292940

FRANCES WHITNEY DEASON  
Assistant Attorney General  
Southern District of Texas No. 2302872

STEPHEN LYLE TATUM, JR.  
Assistant Attorney General  
Southern District of Texas No. 2338090

209 West 14th Street

P.O. Box 12548  
Austin, Texas 70711-2548  
(512) 475-0131

BEN A. DONNELL  
Donnell, Abernethy & Kieschnick  
555 N. Carancahua, Suite 1770  
Corpus Christi, Texas 78401-0853  
Southern District of Texas No. 5689

COUNSEL FOR THE STATE OF TEXAS,  
RICK PERRY, JOHN STEEN, and STEVE  
MCCRAW

**CERTIFICATE OF SERVICE**

I hereby certify that on August 6, 2014, a true and correct copy of the foregoing document was served via electronic mail to all counsel of record.

*/s/ John B. Scott*  
JOHN B. SCOTT